

EXHIBIT H

FORBES, GEORGE

From: Mirel Fisch <mirel@mfischlaw.com>
Sent: Monday, May 9, 2022 2:38 PM
To: FORBES, GEORGE
Subject: Re: O'Hara v. City of New York, et al., 17-cv-4766

Hey George, I'm following up on your objections to the subpoena which Dennis Kelly had served.

While I do agree that some of your objections may have some merit, others are unfounded. We can go ahead and reserve a subpoena, but that would just be a waste of time. Any chance we can just cut to the chase and agree to the production of documents?

You can reach me on my cell at 718-954-1931.

Thanks,
- Mirel

On Mon, Feb 28, 2022 at 9:52 AM FORBES, GEORGE <FORBESG@brooklynda.org> wrote:

Mr. Grandinette and Ms. Fisch,

Attached please find the KCDA's objections to Plaintiff's subpoena.

Regards,

George Forbes, Esq.

F.O.I.L. Unit Chief | Civil Litigation Bureau

Kings County District Attorney's Office

20th Floor | Brooklyn, NY 11201

Tel: (718) 250-5279 | Fax: (718) 250-1362

FORBES, GEORGE

From: FORBES, GEORGE
Sent: Monday, May 9, 2022 2:51 PM
To: 'Mirel Fisch'
Subject: RE: O'Hara v. City of New York, et al., 17-cv-4766

Hi Mirel,

We are always willing to talk. In fact, I think your communication with our office led to our initial production.

I note that we did contact Mr. Kelly immediately to discuss the subpoena – but he was unwilling to negotiate anything. Hence, the objections.

I am trying to file a few motions today, and I have a full day Wednesday, but we can talk Thursday or Friday.

Please let me know your availability.

George,

George Forbes, Esq.

F.O.I.L. Unit Chief
Kings County District Attorney's Office
350 Jay Street
Brooklyn, NY 11201
Tel: (718) 250-5279 | Fax: (718) 250-1362



From: Mirel Fisch <mirel@mfischlaw.com>
Sent: Monday, May 9, 2022 2:38 PM
To: FORBES, GEORGE <FORBESG@BrooklynDA.org>
Subject: Re: O'Hara v. City of New York, et al., 17-cv-4766

Hey George, I'm following up on your objections to the subpoena which Dennis Kelly had served.

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Thanks,

FORBES, GEORGE

From: Mirel Fisch <mirel@mfischlaw.com>
Sent: Friday, June 24, 2022 1:13 PM
To: FORBES, GEORGE
Subject: Re: O'Hara v. City of New York, docket no. 17-cv-4766

Hi George,

I did not forget about the updated subpoena. I've just been swamped and will get it out as soon as possible.

On Fri, Jun 17, 2022 at 12:56 PM FORBES, GEORGE <FORBESG@brooklynda.org> wrote:

Ms. Fisch,

I hope this email finds you well. Pursuant to our conversation, attached please find the privilege log for my Office's original 718 page disclosure.

As we discussed, we are awaiting your revised, targeted, subpoena.

Have a nice weekend.

George,

George Forbes, Esq.

F.O.I.L. Unit Chief

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Brooklyn, NY 11201

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